

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AMADO S. PLA, KEVIN JOSEPH, and  
YISHMAEL LEVI, Individually, And On Behalf Of  
All Other Persons Similarly Situated,

**12 CV 5268 (JMF)**

*Plaintiffs,*

-against-

RENAISSANCE EQUITY HOLDINGS, LLC,  
CLIPPER EQUITY, LLC, MY GUARD SECURITY  
CORP., DAVID BISTRICER, Individually,  
RAFAEL GARCIA, Individually,  
MARC ANTHONY GARCIA, Individually, and  
JOHN MURPHY, Individually,

**DECLARATION OF  
PETER J. ANDREWS  
IN SUPPORT OF  
PLAINTIFFS'  
MOTION FOR  
RECONSIDERATION**

*Defendants.*

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**PETER J. ANDREWS** declares that the following is true and correct:

1. I am an attorney duly admitted to practice in the United States District Court for the Southern District of New York.
2. I am an attorney at The Harman Firm, PC, which represents the Plaintiffs in the above-captioned action and as such, I am fully familiar with the facts and circumstances of this action, the basis of my knowledge being the files maintained by our office and my time working on the above-captioned matter with my office and with Plaintiffs.
3. Annexed hereto as *Exhibit A* is a true and correct copy of the Transcript of the May 9, 2013 Conference before Hon. Jesse M. Furman which includes only the cover page and the pages to which the May 16, 2013 Memorandum of Law in Support of Plaintiffs' Motion for Reconsideration refers.<sup>1</sup>

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<sup>1</sup> *Exhibit A* includes only pages 1, 19–23, and 31.

4. Annexed hereto as *Exhibit B* is a true and correct copy of the Amended Complaint in this action, filed Oct. 1, 2012.

5. Annexed hereto as *Exhibit C* is a true and correct copy of Plaintiffs' Dec. 12, 2012 Memorandum of Law in Further Support of Plaintiffs' Motion for Preliminary Collective Action Certification and in Opposition to Defendants' Motion to Dismiss for Lack of Subject Matter Jurisdiction.

6. Annexed hereto as *Exhibit D* is a true and correct copy of Plaintiffs' Dec. 12, 2012 "safe harbor" letter regarding, *inter alia*, Defendants' Offer of Judgment.

Dated: New York, New York  
May 16, 2013

Respectfully submitted by:  
THE HARMAN FIRM, PC  
*Counsel for Plaintiffs*

s/  
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